

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)

)

)

v.)

Criminal No. 15-CR-10147

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LARRY BAILEY)

**DEFENDANT'S ASSENTED TO MOTION TO
MODIFY CONDITIONS OF RELEASE**

Now comes the defendant, Larry Bailey, and respectfully requests that this Court modify Bailey's conditions of release to allow Bailey to spend Christmas with his son, Larry Bailey, Jr. and for permission to visit his ailing mother. In support thereof, Bailey states the following:

1. Bailey was released on conditions imposed by this Court on September 23, 2015. One condition of Bailey's release is that he may not come in contact with his son, Larry Bailey, Jr., without the presence of his attorney.
2. Without a modification of Bailey's conditions, Larry Bailey, Jr. will not be permitted to attend Christmas dinner at Bailey's home. Therefore, Mr. Bailey requests that his son, Larry Bailey, Jr., be permitted to visit his home from 1:00pm to 9:00pm on Christmas day.
3. Furthermore, under the current conditions of release, Mr. Bailey is only permitted to leave home for Court appearances, visits with his attorney and medical necessities.
4. Mr. Bailey requests permission to visit with his mother, Eloise Bailey, who is ill and is unable to leave her home. Ms. Bailey suffers from lupus, osteopenia, heart disease and various other conditions. Ms. Bailey's address is 375 Columbus Avenue, Boston 02116.
5. Mr. Bailey requests that he be permitted to visit his mother in Boston on Saturday, December 26, 2015 from 1:00pm to 6:00pm.

6. AUSA Emily Cummings assents to this motion.

Wherefore, Bailey respectfully requests that this Court modify the conditions of Bailey's release to remove the condition that Bailey not be in Larry Bailey, Jr.'s presence without his attorney, for one day only on Friday, December 25, 2015, so Bailey may spend Christmas with his son. Additionally, Mr. Bailey requests permission to visit with his ailing mother at her home in Boston as she is unable to leave her residence.

Respectfully Submitted,
LARRY BAILEY,
By his attorney,

/s/ Rosemary Scapicchio
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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each party and upon any party appearing pro se by complying with this Court's directives on electronic filing.

Dated: December 22, 2015

Signed: /s/ Rosemary Scapicchio